

Exhibit 2-E

Paz Discovery

*COURTNEY LINDE, et al. VS.
ARAB BANK, PLC*

*ILAN PAZ
April 19, 2012*



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2 meeting I'm talking about right now took place
3 when he was no longer serving in this -- in
4 this capacity.

5 Q. Do you know whether he was a paid
6 consultant to Arab Bank at the time when you
7 had your meeting concerning your involvement in
8 this case?

9 A. I don't know at all -- I don't know
10 when he started providing services to the Arab
11 Bank, if at all. I think if he did, it was in
12 the earlier period, but I don't know whether he
13 provides services to the Arab Bank -- whether
14 he was providing services to the Arab Bank when
15 I met with him. That, I don't know.

16 Q. Did there ever come a time when you
17 became aware that Mr. Dekel was being
18 compensated by Arab Bank?

19 A. I don't know whether he's being
20 compensated. I know that he was involved. I
21 don't get into the financial area because I
22 don't know. But even if he was compensated,
23 it's not -- it's not a crime.

24 Q. Other than Mr. Ialone (phonetic)
25 and Mr. Dekel, did you have a similar

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2 was.

3 Q. Returning to Exhibit 1 for a
4 moment, the letter from Mr. Walsh, on page four
5 in the first full paragraph in the middle it
6 reads that "In addition, Brigadier General Paz
7 will testify -- Brigadier General Paz will
8 testify that the IDF was familiar with the
9 operations of the West Bank charitable
10 organizations and Zakat committees at issue in
11 these actions, that it had the power to close
12 these organizations if it found that any were
13 involved in the support of terrorism or served
14 the terrorist purposes of Hamas and that he did
15 not do so, nor did he contemplate doing so."

16 MR. OSEN: That's the end of the
17 quote if you could translate that for the
18 witness.

19 Q. Do you plan to so testify?

20 **A.** **Yes.**

21 Q. Can you please list for me the
22 charitable organizations and Zakat committees
23 that are at issue in this litigation?

24 A. No. I can't do it. I'd like to
25 stress that I am not an expert on charitable

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2 organizations. I'm not an intelligence person.
3 I'm a commander who receives briefings on
4 existing intelligence information and acts
5 accordingly.

6 Q. But how can you testify that the
7 IDF was familiar with the operations of the
8 West Bank charitable organizations and Zakat
9 committees at issue in this litigation if you
10 don't know which ones are at issue in this
11 litigation?

12 A. The Civil Administration under my
13 command for most of the time period was
14 responsible for watching or surveilling the
15 charitable organizations that were -- that
16 there were operating in the West Bank. This
17 job was imposed naturally on the division
18 for --

19 (In English) Branch.

20 (Interpreted) -- For the branch of
21 Arab affairs. And they carried out this
22 surveillance or this observation and I received
23 reports sometimes on a daily basis, but at
24 least on a weekly basis. Some of the reasons
25 for the surveillance that was carried out by

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Mr. Werbner to strike that answer, but
we'll proceed.

4

Q. Let's turn back again to the
operation against accounts held in various

5

branches of Arab Bank in 2004 in Ramallah.

6

A. "Operations" you said?

7

Q. Operations, plural, because there
were multiple branches involved but you can --

8

A. He's right. One operation at two
banks.

9

Q. Two banks and multiple branches,
but for purposes of my question, I just want to
refer to the matter as a whole.

10

A. To the best of my recollection it
was two branches, but it's really immaterial.

11

Q. Okay. You mentioned that you
attended one meeting concerning this operation;
is that correct?

12

A. With respect to a meeting with many
people present, I participated in one such
meeting. I was involved in the participation
of my people in such operations several times
prior to that.

13

Q. Okay. Let's take the big meeting

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2 that you just referred to. What can you tell
3 us your -- of your personal recollection of
4 that meeting?

5 A. I decided to participate in that
6 meeting, which took place in the offices of
7 Ofer Dekel who was already serving in his
8 position as deputy head of the Israel security
9 services and he coordinated all of the
10 preparations in anticipation of that operation.

11 That was led by the Israel security
12 services of course. I had became aware of the
13 operations several weeks prior to that. I was
14 asked to approve the participation of my people
15 into realms and because this was not a routine
16 type of operation, not something that we're
17 engaged in on a daily basis, generally because
18 of the fact that we were dealing with money
19 here, an international institution, which was
20 headquartered in a neighboring country with
21 which we had peaceful relations.

22 A large peaceful organization which
23 yielded great influence throughout the
24 territories. I had a number of issues that I
25 wanted to hear about and to ensure that they

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2 were well-planned or at least that they were
3 being taken into account with respect to the
4 operations that preceded the operations and
5 followed the operations.

6 And, therefore, I decided to
7 participate. In my opinion, it was sort of a
8 summary meeting finalizing things prior to the
9 operation a day or two before the operation
10 took place. I participated in that meeting.
11 To the best of my recollection, most of the
12 issues that I made a note to myself that I
13 should check had been resolved as far as I was
14 concerned or the -- or the planning took them
15 into account in a manner that was satisfactory
16 to me.

17 Upon the completion of the meeting,
18 I stayed and had a one-on-one meeting with Ofer
19 Dekel. It's possible that his assistant was
20 also present. I do not recall. Generally he
21 also takes part and I asked him two questions.
22 The first question was whether the operation
23 was directed against the bank or against the
24 specific individuals who were account holders
25 there.

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And the second question was whether
that operation had been examined from a legal
standpoint. With respect to the -- with
respect to the second question, I was told that
it was totally obvious, however; that it was
not a question that needed to be asked by
commanders in the military.

9

And with respect to the first
question, I was told that the operation was
intended for the purpose of the confiscation of
funds belonging to specific individuals that
are involved in terrorism and not against the
bank, and, therefore, it was planned so that
the bank could continue its activity
immediately upon the conclusion of the
operation.

18

That's what took place in the
meeting and immediately thereafter. I did not
take part in the operation itself. However, I
received a report from my people who did
participate in it, subsequent to its
conclusion, the next morning. That's it.

24

MR. OSEN: We'll take our break for
lunch and pick this up afterwards.